

Dear FCC,

I submit my comments from my position as a licensed amateur radio operator, hold an Advanced Class license, and as an emergency manager of a small rural County.

Of the four items pending for your consideration, I must support the position of the American Radio Relay League in the matter of Licensing Restructuring.

As you are aware, the other petitions are:

RM-10868 filed by the Radio Amateur Foundation

RM-10869 filed by Ronald D. Lowrance, K4SX

RM-10870 filed by National Conference of Volunteer Examiner Coordinators

RM-10867, filed by the American Radio Relay League, deserves your consideration, above all others, in a number of factors:

1) The League went to great lengths to poll the Amateur Radio community before sending their petition to the FCC. In short, I was asked by no other group, but the ARRL, for my thoughts regarding the issues before you today.

2) The League proposal, unlike RM-10870, does not eliminate the Morse Code requirement. It keeps it for the Extra Class licensee. This is important for two reasons.

First, the current Extra Class licensee has worked very hard to obtain that level of skill. By eliminating the code altogether, the FCC is, essentially, telling that operator that his effort was for naught.

Second, in the case of the old "incentive" licensing, this license would have some additional incentive, under the League plan, with frequencies reserved only for that level of license.

3) In the matter of RM-10869, this does nothing more than to move the mission of those who wish to keep things the way they are. Morse Code is a reliable communications tool in an emergency. However, by those in the emergency response community, it has fallen on disfavor. For example, during the last disaster in this County, amateur radio operators were used but none of them were using Morse code.

4) In the matter of RM-10870, there is no incentive to the operators to upgrade. They get privileges on all bands below 24 MHz. The only difference is the power. Additionally, it has been a long held belief by this Commission that one of the focal points of amateur radio is experimentation and "homebrew" equipment. This proposal cracks, if not destroys, the foundation of letting a licensed amateur radio operator from building their own equipment, other than in a "store-bought" kit.

5) RM-10868 does not build a good case that the current system is broken. In other words, there is no need to scrap the current system in favor of something else. However, I do support their call for amateur radio operators to be able to request vanity call signs, only after they have been licensed for a specific period of time. I do not agree that digital experimentation should be allowed in the 29.0 to 29.3 MHz range.

This is near, if not in, the AM subband on 10 meters. We should not

move AM but rather allow the digital experimentation in other segments of the band.

Therefore, Commission, I see many more flaws in the other plans and many fewer in the League plan. I respectfully submit that the League plan is acceptable to many amateur radio operators, League members or not. It is worthy of your consideration above all the other proposals.

Thank you for this opportunity to give my input.

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Homeland Security begins at Home.	